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Minnesota Department of **Human Services**

December 9, 1997

Cynthia L. Johnson, Director
Cash Management Policy and Planning Division
Financial Management Service
U.S. Department of the Treasury
401-14th Street S.W. Room 420
Washington, DC 20227

Re: Comments on Proposed Rule - 31 CFR Part 208

Dear Ms. Johnson:

The Minnesota Department of Human Services has two comments on the proposed rule addressing the Electronic Funds Transfer (EFT) 99 initiative. Both comments are related to the linkage of federal payments to state electronic benefit transfer (EBT) programs:

- It is not clear how the option of accessing federal payments and state-administered payments with a single card will work if the financial institution(s) selected by Treasury to act as its agent is not the same financial institution as the State's EBT Issuer. We encourage Treasury to engage a number of financial institutions to act as its financial agents.
- The differences in consumer protection rights for federal payments and state EBT issuances may also hinder efforts to have both state and federal benefits on a single card.

We appreciate the opportunity to comment on the proposed rule.

Sincerely,

Barbara Anderson
Chief Information Officer